

2007 DEC 13 PM 4:20

U.S. District Court  
Northern District of Ohio

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KATHLEEN B. DRAKE,

Defendant.

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CR. NO.

Title 29, United States Code  
Section 439(c)

COUNT I MAG. JUDGE VECCHIARELLI

The United States Attorney charges:

**General Allegations**

1. That all times hereinafter mentioned and within the meaning of Sections 3(i) and 3(j) of the Labor-Management Reporting and Disclosure Act of 1959, 29 U.S.C. §§ 402(i) and 402(j), hereinafter referred to as the Act:

(a) International Association of Machinists, Local Lodge 2339-C, hereinafter referred to as the Union, was and is a labor organization representing employees in an industry

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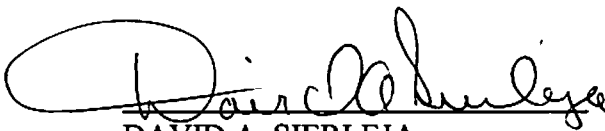
affecting commerce and has conducted and conducts its operations in Cleveland, Ohio, and maintained an office in Cleveland, Ohio.

(b) At all times relevant herein, the defendant, KATHLEEN B. DRAKE, was the Secretary Treasurer of the Union and as such was an officer of a labor organization within the meaning of Section 3(n) of the Act [29 U.S.C. § 402(n)].

**Statutory Charge**

2. That from on or about November 30, 2000, through on or about January 9, 2003, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendant, KATHLEEN B. DRAKE, did willfully make and cause to made false entries in a record required to be maintained by Section 436 of Title 29, United States Code, that is, payment vouchers, records on matters required to be reported in the annual financial reports of the Union required to be filed with the Secretary of Labor.

All in violation of Title 29, Section 439(c), United States Code.

  
DAVID A. SIERLEJA  
Acting United States Attorney